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February 25, 2011

**BY HAND AND BY ECF**

Honorable Sandra L. Townes  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

***Re:     United States v. James Bombino, et al., 10 Cr. 147 (SLT)***

Dear Judge Townes:

With the consent of the government, I respectfully write on behalf of all parties to request that the current motion schedule be revised in the above-referenced matter. Following the last status conference on December 1, 2010, the government has provided substantial additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure that is material to the defendants' identification of motions that need to be filed.

The parties therefore respectfully request the following revised motion schedule:

Defendants' motions due:     April 1, 2011  
Government's response due: May 6, 2011  
Defendants' reply due:       May 20, 2011

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We also respectfully ask that the Court schedule a status conference at its earliest convenience to address additional issues arising from the government's most recent massive discovery dump.

Respectfully submitted,  
/s/  
Sarita Kedia

cc: AUSA Amy Busa  
AUSA Michael Tremonte

All defense counsel